

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

MATTHEW J. PEASE,

Plaintiff,

VS.

SECURITIES & EXCHANGE
COMMISSION, FINANCIAL INDUSTRY
REGULATORY AUTHORITY, JOHN
BRDA, GREGORY MCCABE, NEXT
BRIDGE HYDROCARBONS, INC.,

Defendants.

[illegible]

Case No. 7:24-CV-322-DC-RCG

**DEFENDANT BRDA'S PARTIALLY OPPOSED
MOTION TO EXTEND PLEADING DEADLINE**

Defendant John Brda files this partially opposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint (Doc. 12) and respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 6, 2024 (Doc. 1), and an Amended Complaint on December 27, 2024. (Doc. 3)
2. On January 10, 2025, Plaintiff requested an issuance for summons (Doc. 6), which was issued on January 14, 2025. (Doc. 7)
3. After obtaining leave (Doc. 9), Plaintiff filed a Second Amended Complaint on February 26, 2025, which spans over 90 pages and 328 paragraphs, against 5 defendants, with at least 17 causes of action. (Doc. 12)
4. On March 6, 2025, Mr. Brda was served with the Second Amended Complaint and his deadline to answer or otherwise respond to the Second Amended Complaint is currently March 27, 2025.

5. Undersigned counsel is aware of at least three other matters pending before the Court where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Willcot v. SEC, et al.*, No. 7:24-cv-317 (W.D. Tex. Dec. 6, 2024);
- *Spears v. Next Bridge Hydrocarbons Inc., et al.*, No. 7:24-cv-321 (W.D. Tex. Dec. 6, 2024); and
- *Vetrano v. Brda, et al.*, No. 7:24-cv-325 (W.D. Tex. Dec. 9, 2024).

6. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Mr. Brda's defenses and promote judicial economy.

7. The Court granted a similar extension in *Vetrano*, *Spears*, and *Willcot* on March 17, 2025, March 19, 2025, and March 24, 2025, respectively, extending Mr. Brda's responsive pleading deadline in those matters to June 16, 2025.

8. Accordingly, Mr. Brda respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint to June 16, 2025—the same deadline as *Vetrano*, *Spears*, and *Willcot*.

9. This is Mr. Brda's first request for an extension of time.

10. This extension is not sought for purposes of delay, but so that justice may be done.

11. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated he is opposed to the full requested extension. Plaintiff stated he is unopposed to a 60-day extension but is opposed to a longer extension.

[signature page follows]

Dated: March 24, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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ATTORNEYS FOR DEFENDANT JOHN BRDA

CERTIFICATE OF CONFERENCE

Pursuant to Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Brda, he conferred with Plaintiff Matthew Pease via telephone and email on March 20, 2025. Plaintiff has indicated that he is partially opposed to the relief requested by this motion.

/s/ Ryan D. Lantry
Ryan D. Lantry

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on March 24, 2025.

/s/ Jason S. Lewis
Jason S. Lewis